



January 03, 2024

Hon. Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn New York 11201

VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-PK (EDNY)  
MOTION TO CONVERT IPTC TO A PHONE CONFERENCE

Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to your Order dated October 5, 2023 [Dkt.05], there is an in-person Initial Pre-Trial Conference scheduled for this matter scheduled for January 31, 2024. We hereby respectfully request it be converted to a telephone conference. Per your individual rules of civil practice (iii. C. 2):

- a. **the original date of the conference (if for an adjournment) and the number of previous requests:** Date for the IPTC is January 31, 2024
- b. **the reason for the request; whether the other parties consent to the request, and, if not, the reasons given for not consenting; or, if the other parties could not be reached for input, efforts made to reach those parties.:** The reason for this request is that I will not be available in person as I am scheduled to be out of town that day due to a prior commitment. I do not wish to delay the conference, however, and am available to attend virtually or via telephone. Should in person be necessary, I request it be set for February 15, 16, or 26.

Additionally, Counsel for the Defendants consents to this request. This request is not anticipated to impact or affect any other deadlines in this case.

Thank you for your consideration.

Sincerely,

Penn Dodson, Esq.  
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